

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**STATUS UPDATE, STIPULATION,
AND [PROPOSED ORDER]
REGARDING PLAINTIFFS' AND
YOUTUBE'S DMCS RIPE DISPUTES
ISSUES 2 AND 3**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

1 Defendants YouTube, LLC and Google, LLC (together, “Defendants”), and PI/SD
 2 Plaintiffs (collectively, the “Parties”), respectfully submit this update and stipulation to the Court:

3 WHEREAS, a Discovery Case Management Conference is scheduled before this Court on
 4 October 24, 2024.

5 WHEREAS, on October 18, 2024, the Parties filed a Discovery Case Management
 6 Statement, providing the Court with discovery updates, including ripe discovery disputes. With
 7 respect to Defendants YouTube and Google, the Parties raised, among other things, Ripe Dispute
 8 No. 2 [*YouTube’s Amended Responses or Confirmation in Writing of Agreements Reached by*
 9 *Parties*], and Ripe Dispute No. 3 [*YouTube’s Search of Non-Custodial Sources Identified by PI/SD*
 10 *Plaintiffs*]. The Parties provided their substantive positions on Ripe Dispute No. 2 in the Discovery
 11 Case Management Statement and reported that they intended to file a joint letter brief on Ripe
 12 Dispute No. 3 by October 22, 2024, so that both issues could be considered by the Court at the
 13 October 24, 2024, conference.

14 WHEREAS, the Parties have continued their discussions on both issues and have reached
 15 an agreement that they believe will resolve those issues or inform the scope of any remaining
 16 disputes on those issues.

17 NOW AND THEREFORE, the Parties respectfully request that the Court defer decision
 18 on Ripe Dispute No. 2 so that the Parties can engage in further meet and confers, and that the Court
 19 adopts the following schedule to ensure timely and efficient briefing of this issues:

- 20 a. No later than October 25, 2024, by 5PM PT, Defendants will provide to Plaintiffs,
 in writing, agreed upon information regarding its search of non-custodial sources;
- 21 b. No later than October 29, 2024, the Parties will hold a meet and confer on Ripe
 Dispute Nos. 2 and 3;
- 22 c. No later than November 1, 2024, by 5PM PT, Plaintiffs will identify to Defendants,
 in writing, any remaining issues as to Ripe Disputes Nos. 2 and 3;
- 23 d. No Later than November 6, 2024, by 5PM PT, Defendants will provide to Plaintiffs,
 in writing, substantive responses to remaining issues on Ripe Dispute Nos. 2 and 3;

- 1 e. No later than November 8, 2024, the Parties will hold an H(2) on any remaining
 2 issues on Ripe Dispute Nos. 2 and 3; and,
- 3 f. No later than November 15, 2024, the Parties will file joint letter briefs as to any
 4 remaining issues on Ripe Dispute Nos. 2 and 3, so that the Court may consider the
 5 briefs at the next Discovery Case Management Conference.
- 6 g. The Parties agree to meet and confer in good faith at Plaintiffs' reasonable request
 7 for information regarding YouTube's search and production from non-custodial
 8 sources newly identified by Plaintiffs in YouTube's document production that
 9 appear likely to contain relevant information or in response to an identified
 10 deficiency. Plaintiffs agree that they will be reasonable and judicious in making any
 11 such requests.

12

13 IT IS SO STIPULATED AND AGREED,

14

15 DATED: October 22, 2024

WILSON SONSINI GOODRICH & ROSATI
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DATED: October 22, 2024

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ATTESTATION

I, Lauren Gallo White, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: October 22, 2024

By: *s/ Lauren Gallo White*
Lauren Gallo White

ORDER

IT IS SO ORDERED that the foregoing Stipulation is approved:

DATED: October 23, 2024

Hon. Peter H. Kang
United States Magistrate Judge